

**SUPREME COURT OF NEW JERSEY
DOCKET NO. 090121**

STATE OF NEW JERSEY,

Plaintiff-Respondent,

v.

TYRELL S. LANSING,

Defendant- Appellant.

CRIMINAL ACTION

On Appeal from an Interlocutory Order of
the Superior Court of New Jersey,
Appellate Division

Docket No. A-1592-23

Sat Below:

Hon. Greta Gooden Brown, J.A.D.
Hon. Patrick DeAlmeida, J.A.D.
Hon. Robert M. Vinci, J.A.D.

**BRIEF OF PROPOSED AMICUS CURIAE ASSOCIATION OF
CRIMINAL DEFENSE LAWYERS OF NEW JERSEY**

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SUPREME COURT
OF NEW JERSEY

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STATEMENT OF INTEREST OF AMICUS CURIAE

Proposed amicus curiae Association of Criminal Defense Lawyers of New Jersey (“ACDL-NJ”) is a non-profit corporation organized under the laws of New Jersey to, among other purposes, “protect and insure by rule of law, those individual rights guaranteed by the New Jersey and United States Constitutions; to encourage cooperation among lawyers engaged in the furtherance of such objectives through educational programs and other assistance; and through such cooperation, education and assistance, to promote justice and the common good.” ACDL-NJ By-Laws, Article II(a). Founded in 1985, ACDL-NJ has more than 500 members across New Jersey.

Our courts have found that ACDL-NJ has the special interest and expertise to serve as an amicus curiae pursuant to Rule 1:13-9 in numerous cases throughout the years, including those involving court rules and confrontation clause issues. See, e.g., State v. Watson, 254 N.J. 558 (2023); State v. Sims, 250 N.J. 189 (2022); State v. Hedgespeth, 249 N.J. 234 (2021). Thus, ACDL-NJ has the requisite interest to participate as amicus curiae and its participation will be helpful to this Court. Accordingly, ACDL-NJ asks that its motion for leave to participate as amicus curiae be granted.

PRELIMINARY STATEMENT

Rule 1:2-1(b) authorizes contemporaneous virtual testimony in open court upon a showing of “good cause.” This standard—adopted by the New Jersey Supreme Court and made effective as of September 1, 2022—marked a clear departure from the more stringent federal rule and the recommendation of the Supreme Court’s Family Practice Committee, both of which required a showing of “good cause in compelling circumstances.” By eliminating the “compelling circumstances” language, the Court adopted a more accessible, equitable framework informed by the judiciary’s direct experience during the COVID-19 pandemic. That experience confirmed that with appropriate safeguards, virtual testimony can contribute to fairness, promote efficiency, and expand access to justice, especially for criminal defendants with limited resources.

This change was substantive, not semantic. “Compelling circumstances” imposes a significantly higher burden, creating a presumption against virtual testimony that this Court expressly rejected. By contrast, the “good cause” standard empowers trial courts to allow remote testimony where defense counsel shows reasonable need or a logical reason. Rule 1:2-1(b) was enacted against that backdrop—not under the federal framework.

Despite this, both the trial court and the Appellate Division applied a more rigid standard. By relying on the seven-factor test from Pathri v. Kakarlamath,

462 N.J. Super. 208 (App. Div. 2020)—a case that predates Rule 1:2-1(b) and is grounded in the now-rejected federal framework—the lower courts reinstated a burden that this Court expressly declined to adopt. Their approach is inconsistent with the Rule’s purpose and undermines the fair administration of justice. This error warrants reversal.

This is especially true in criminal cases, where expert testimony has become central to many prosecutions. Defense counsel, both private and public defenders, face significant challenges in identifying, retaining, and affording qualified experts, many of whom are based out of state, have expertise in specific disciplines that are not readily accessible, have busy professional schedules, and are expensive to retain. The State, by contrast, has more consistent access to in-person experts through federal, state and county agencies, forensic labs, and law enforcement. Allowing the defense to present expert testimony virtually, upon a showing of good cause, helps level the playing field.

The State’s ability to cross-examine an expert witness is not compromised by remote testimony. The expert’s report will already disclose the basis for his or her testimony, including the expert’s history and qualifications, the materials reviewed, the opinions to be offered, and the basis for those opinions. Prosecutors are well-versed in using courtroom technology to introduce and

display exhibits and conduct thorough cross-examinations virtually. Jurors will be able to view the witness through video as well as or better than if the witness testified in person. Tactical concerns about remote testimony, such as the potential impact on persuasiveness, are decisions for defense counsel and the defendant, not the State.

Rule 1:2-1(b) was enacted to ensure fairness, efficiency, and access to justice—not to create new barriers. When, as here, the defense has demonstrated good cause—namely, that their expert is only available to testify remotely, and defense counsel has determined that the expert testifying remotely is the best alternative for his or her client—the motion should be granted. The lower courts’ reliance on an outdated, inapplicable standard was error, and their decision should be reversed.

STATEMENT OF FACTS & PROCEDURAL HISTORY

ACDL-NJ adopts the procedural history and statement of facts set forth in Defendant’s merits brief and the Appellate Division’s opinion.¹

LEGAL ARGUMENT

I. Rule 1:2-1(b) Reflects a Deliberate Shift from the Presumption of In-Person Testimony to a More Flexible “Good Cause” Standard.

Historically, New Jersey courts disfavored virtual testimony, viewing it

¹ State v. Lansing, 479 N.J. Super. 565 (App. Div. 2024).

as a last resort allowed only in rare, exigent circumstances. See, e.g., Pathri, 462 N.J. Super. at 216; Aqua Marine Prods., Inc. v. Pathe Computer Control Sys. Corp., 229 N.J. Super. 264, 274-75 (App. Div. 1988). That changed with the adoption of Rule 1:2-1(b), which allows contemporaneous remote testimony upon a showing of “good cause” and with appropriate safeguards. R. 1:2-1(b). Historically, New Jersey’s courts have favored in-person testimony based on the belief that in-person observation of demeanor and nonverbal cues is important to assessing credibility and ensuring a fair and reliable fact-finding process. But this preference arose at a time when trial courts had limited exposure to virtual proceedings and the technology that supports high-quality remote testimony was not yet available.

This evolution was informed by the judiciary’s success with virtual proceedings during the COVID-19 pandemic, which proved remote testimony feasible, efficient, and fair. Beginning in March 2020, New Jersey Courts pivoted rapidly to virtual platforms. In just two months—from March to May 2020—New Jersey courts conducted more than 23,000 virtual proceedings involving more than 189,000 participants, including motions, settlement conferences, arraignments, and detention hearings. See State v. Vega-Larregui, 246 N.J. 94, 105 n.4 (2021). By April 2022, all twenty-one counties were regularly conducting virtual grand jury proceedings involving the presentation

of virtual witnesses and documents. Indeed, virtual grand jurors heard evidence and considered whether to return indictments in more than 6,000 cases. See id. at 108-09.

Virtual platforms are now familiar to courts and attorneys. The technology allows parties to present and assess evidence effectively. This Court has observed that virtual proceedings can support meaningful credibility assessments and “judges do so in remote proceedings in many contested matters, such as testimonial hearings, municipal court trials, and even civil jury trials.” Id. at 133. As noted in the official commentary to the Rule, the pandemic-era experience “laid the groundwork” for permanent “rule adoptions providing for the use of these technologies.” Pressler & Verniero, Current N.J. Court Rules, cmt. 2 on R. 1:2-1 (2025).

II. Rule 1:2-1(b) Rejected the Elevated “Compelling Circumstances” Standard in Favor of a More Equitable “Good Cause” Standard.

As part of its Omnibus Rule Order, effective September 1, 2022, the New Jersey Supreme Court adopted Rule 1:2-1(b), which is applicable to criminal, civil, and family cases. The Rule provides:

[u]pon application in advance of appearance, unless otherwise provided by statute, the court may permit testimony in open court by contemporaneous transmission from a different location for good cause and with appropriate safeguards.

[R. 1:2-1(b) (emphasis added).]

Rule 1:2-1(b) reflected a deliberate departure from more restrictive models that predated it. The Family Practice Committee, in its Supplemental Report to the Supreme Court, had recommended adopting the language of Fed. R. Civ. P. 43(a), which allows virtual testimony only “for good cause in compelling circumstances and with appropriate safeguards.”

The Supreme Court declined that approach. It did not adopt the language of the federal rule or the Committee’s proposed standard, and it did not endorse the logic of Pathri, discussed below. Instead, it adopted a more accessible and equitable model that permits virtual testimony based on a showing of “good cause” alone—without the heightened threshold of “compelling circumstances.” This modification appears to have been made intentionally and with purpose. See, e.g., Munoz v. New Jersey Auto. Full Ins. Underwriting Ass’n, 145 N.J. 377, 388 (1996) (declining plaintiffs’ invitation to “adopt an interpretation of a statute that was expressly rejected by the Legislature,” where Legislature “fail[ed] to adopt” a particular provision without explanation); State v. Pena, 178 N.J. 297, 312 (2004) (that drafters of Model Penal Code “considered, and rejected” certain language in their final draft was indicative of legislative intent); accord State v. Fortin, 178 N.J. 540, 654-55 (2004) (Verniero, J., concurring) (“Had the earlier language regarding appeals remained, defendant could have invoked it . . . as proof that lawmakers intended

to apply the statute to him. Its timely removal by the Legislature suggests a sensitivity to constitutional issues incongruent with today’s interpretation.”).

Furthermore, this modification was substantive. As the Court has explained, “[t]he statutory requirement of ‘compelling need based on specific facts’ . . . denotes an elevated standard; it requires more than the fundamental benchmark of good cause.” New Jersey Division of Child Protection v. A.P., 258 N.J. 266, 280 (2024) (emphasis added). Requiring compelling circumstances imposes a presumption against remote testimony, limits its availability to exceptional cases, and places an onerous burden on the proponent. Rule 1:2-1(b) eliminated this elevated standard and signaled a new paradigm. It no longer treats virtual testimony as a rare exception. Instead, it authorizes trial courts to evaluate requests under a flexible, fact-specific “good cause” standard, guided by discretion and informed by the practical realities of the proceeding, which is particularly vital in criminal matters where the defense often faces resource or logistical constraints.

III. The Lower Courts Erred by Applying Pathri and Reinstating a Standard that this Court Explicitly Rejected.

Despite acknowledging that Pathri predates Rule 1:2-1(b), the Appellate Division applied its seven-factor test derived from the federal rule. See Lansing, 479 N.J. Super. at 575–76. This was legal error. Rule 1:2-1(b) eliminated the “compelling circumstances” threshold. By applying Pathri, the

lower courts reimposed a presumption against remote testimony contrary to the Rule's text and purpose.

The Pathri factors were created to evaluate whether testimony should be permitted remotely under exceptional, exigent circumstances. See Pathri, 462 N.J. Super. at 216 (recognizing that “exigency” and “good cause in compelling circumstances” are “two ways of expressing the same thing”). They ask whether the witness’s testimony is central to a disputed issue, whether credibility is at stake, and who the factfinder is—factors grounded in the assumption that remote testimony is disfavored. That assumption is no longer valid under the current Rule.

Rule 1:2-1(b) directs courts to evaluate whether the party seeking remote testimony has demonstrated good cause—not compelling need—and to do so through a flexible, context-specific lens. New Jersey courts have repeatedly affirmed that good cause is not a rigid or formulaic concept. It requires the exercise of sound discretion based on the facts and circumstances of the case and the purposes of the rule at issue. See, e.g., D.W. v. R.W., 212 N.J. 232, 251 (2012) (“What constitutes good cause obviously will vary with the unique circumstances of each particular case, but guideposts are needed to direct the way for our trial courts.”); Ghandi v. Cespedes, 390 N.J. Super. 193, 196 (App. Div. 2007) (recognizing that “good cause” is “amorphous” but requires “the

exercise of sound discretion in light of the facts and circumstances of the particular case considered in the context of the purposes of the Court Rule being applied” (citation omitted)); Templeton Arms v. Feins, 220 N.J. Super. 1, 21 (App. Div. 1987) (“The good cause standard, then, is flexible, taking its shape from the particular facts to which it is applied.”) As this Court recently noted:

The familiar standard of “good cause” does not have a precise definition governing every setting; rather, its application requires the exercise of sound discretion in light of the facts and circumstances of the particular case considered in the context of the purposes of the [statute or rule] being applied. . . . When the Legislature made “good cause” part of N.J.S.A. 2C:52-19’s required showing, it imposed a flexible standard – not a stringent test – on the party seeking to use expunged records.

[A.P., 258 N.J. at 280 (cleaned up).]

Accord State v. Arroyo-Nunez, 470 N.J. Super 351, 378 (App. Div. 2022).

These are the decisions the lower courts should have followed—not Pathri, which was based on a heightened evidentiary standard rejected by this Court.

A survey of states with rules similar to Rule 1:2-1(b) demonstrates that the practical difference between “good cause” and “good cause and compelling circumstances” is striking. Compare In re H.B., 2022 IL App (2d) 210404, ¶ 70 (2022) (“Good cause is likely to arise when a witness is unable to attend trial for unexpected reasons, such as accident, illness, or limited court operations, but also in foreseeable circumstances such as residing out of state.” (citation

omitted)), with Benshoof v. Owen, 32 Wash. App. 2d 1012 (2024) (recognizing that defendant generally must come forward with unforeseen circumstances to establish “good cause and compelling circumstances”). Indeed, while a witness’s health issues and out-of-state residence easily satisfy a “good cause” standard, see Spencer v. Ray, et. al., 2025 IL App (4th) 240919-U, ¶ 46 (2024), the same would not be true under a “compelling circumstances” standard, State ex rel. Malmquist v. Malmquist, 2018 WL 6261863, at *4 (Tenn. Ct. App. Nov. 29, 2018) (under compelling circumstances standard, lack of funds and temporary disability were insufficient to satisfy requisite showing).

Accordingly, this Court should hold that Pathri does not govern motions brought under Rule 1:2-1(b) and clarify that trial courts must apply a flexible “good cause” standard consistent with its broader jurisprudence. See, e.g., D.W., 212 N.J. at 251 (“[G]uideposts are needed to direct the way for our trial courts.”). In keeping with these principles, where a criminal defendant seeks to present remote expert testimony for a logical reason or a reasonable need, the motion should be granted.

IV. The Facts of This Case Demonstrate "Good Cause" for Virtual Testimony

The defense expert in this case—a forensic video analyst—was retained to respond to the State’s photogrammetry evidence. Photogrammetry is “a scientific field involving the use of photography in surveying and mapping to

measure the distance between objects.” Lansing, 479 N.J. Super. at 567. The State’s expert prepared a reconstruction of the shooting using visualizations and graphics. Id. at 568.

In response, defense counsel located a qualified expert capable of analyzing and rebutting the State’s technical evidence. Ibid. However, the expert and his wife both have significant health concerns and, therefore, the expert agreed to assist only on the condition that he be permitted to testify remotely. Id. at 569. Based on the expert’s qualifications and the needs of the defense, counsel determined that he was the best available witness for the case.

The defense’s decision to retain this expert and seek virtual testimony is a reasonable and strategic exercise of judgment in light of the circumstances. Rule 1:2-1(b) was designed precisely to accommodate such realities. Where expert testimony is necessary, and the expert is willing to participate only via remote means for legitimate reasons, and defense counsel has determined that the expert testifying remotely is the best alternative for his client, good cause plainly exists.

V. The Confrontation Clause Does Not Limit a Defendant’s Use of Remote Testimony

The Sixth Amendment of the United States Constitution and Article I, Paragraph 10 of the New Jersey Constitution guarantee criminal defendants the right to confront, face, and cross-examine the State’s witnesses in a public

proceeding. U.S. Const. amend. VI; N.J. Const. art. I, ¶ 10. These constitutional protections are asymmetrical. They confer rights on the accused, not on the prosecution.

The Confrontation Clause has no bearing on a defendant's effort to present remote testimony. Rule 1:2-1(b) does not diminish any confrontation rights, nor can it. See, e.g., State v. Williams, 219 N.J. 89, 99 (2014) (recognizing that the Confrontation Clause “guarantees the accused the right to confront those who bear testimony against him,” which can only be waived by the defense (citation omitted)). Rather, it provides an additional tool for the defense to present evidence, consistent with the defendant’s right to a fair trial.

Witnesses called by the State may not testify remotely over the objection of the defendant, as this would raise serious confrontation issues. See, e.g., id. at 92 (recognizing that the Confrontation Clause “gives a defendant the opportunity to bar testimony in violation of the Confrontation Clause and the opportunity to cross-examine a witness”); cf. United States v. Yates, 438 F.3d 1307, 1318 (11th Cir. 2006) (en banc) (recognizing that prosecutor’s stated reasons for remote testimony were not “important enough to outweigh the [d]efendants’ rights to confront their accusers face-to-face”). But where a defendant seeks to present testimony remotely, no such constitutional problem arises. The Rule enhances defendants’ rights, it does not diminish them.

VI. Remote Testimony Does Not Prejudice the State.

The State asserts that it would be prejudiced by allowing remote expert testimony, but does not (and cannot) offer any concrete harm. When the proposed witness is an expert, there is little risk of unfair surprise or strategic disadvantage to the State. Expert reports are pre-disclosed, qualifications are known, and opposing counsel can prepare in advance. The State will thus be fully equipped to conduct a thorough and effective cross-examination.

Remote cross-examination of experts is now routine and effective. Prosecutors and defense attorneys alike regularly use digital technology in courtrooms to present documents, videos, and demonstratives during trial. Exhibits can be pre-disclosed, screen-shared, or navigated virtually in real time. Attorneys typically plan and structure their cross-examinations well in advance, often with the input of their own experts, and are well-prepared to challenge opposing expert opinions using a combination of evidence, publications, and prior testimony.

Jurors can view witnesses clearly on monitors or tablets, often more closely than in person. Credibility assessments are not impaired. In many courtrooms, due to layout or acoustics, jurors are seated at significant distances from the witness, or at angles where facial expressions and body language are difficult to observe—and witnesses are difficult to hear even with

amplification. Remote testimony eliminates these challenges, enabling jurors to simultaneously see both close-up and full-body views of the witness. If needed, headphones with adjustable volume can be provided.

Studies and judicial experience confirm that virtual testimony can enhance, rather than hinder, the ability to assess demeanor. See Marisa Pasnick, Washington Civil Jury Trials Via Zoom: Perspectives from the Bench, 99 Wash. L. Rev. 685, 698 (2024) (recognizing that virtual platforms “may provide an improved experience” for assessing demeanor); Dr. Karen Lisko, Bearing Witness To, Well, Witnesses: An Examination of Remote Testimony Versus In-Court Testimony, 51 Sw. L. Rev. 63, 66 (2021) (reporting that jurors could more readily “assess [witness’s] emotion” on Zoom than in person); Alicia Bannon, Remote Court: Principles For Virtual Proceedings During The COVID-19 Pandemic And Beyond, 115 Nw. U. L. Rev. 1875 (2021) (“[S]ome judges have suggested that it is actually easier for them to assess credibility over a videoconference because they can see the witnesses’ full faces rather than ‘someone’s left ear’ peering from the bench”).

Increasingly, prosecutors rely on digital forensics, reconstruction models, and specialized expert testimony to build their cases. In turn, defendants must be able to retain qualified experts to analyze, critique, and respond to that evidence. As the Federal Judicial Center’s Reference Manual on Scientific

Evidence explains:

Adversarial testing [of expert testimony in criminal cases] presupposes advance notice of the content of the expert's testimony and access to comparable expertise to evaluate that testimony. Just how effectively can the defendant in a criminal case challenge the government's expert testimony without access to a comparable defense expert to review the work done by the government's expert and critique any factual insufficiencies or methodological shortcomings? And without informed and skilled challenge by the defense, how is the trial judge to perform his gatekeeping duty and make the findings required by Rule 702 and Daubert when deciding objections to government experts?

[See Paul W. Grimm,² Challenges Facing Judges Regarding Expert Evidence in Criminal Cases, 86 Fordham L. Rev. 1601, 1608 (2018).]

But unlike the prosecution, defendants rarely have access to in-house experts or government-funded forensic labs. As Professor Richard D. Friedman notes, “the prosecution usually has means and resources for producing witnesses that are superior to those of the accused.” Richard D. Friedman, Remote Testimony, 35 U. Mich. J.L. Reform 695, 714 (2002). The State can draw upon full-time government experts, including those from the FBI and other federal agencies, to examine evidence and appear in court. This includes

² Paul W. Grimm is a retired United States District Court Judge for the District of Maryland. He retired on December 30, 2022. He is currently the David F. Levi Professor of the Practice of Law and Director of the Bolch Judicial Institute at Duke Law School.

experts to assist with the forensic examination of evidence, case consultation, and in-court testimony. Similar support and resources are not available to the defense. Grimm, 86 Fordham L. Rev. at 1608 (“[W]hen defense attorneys do decide to retain a defense expert, they may have difficulty finding one because many of the experts needed in criminal cases come from law enforcement.”); See generally Paul C. Giannelli, The Right to Defense Experts, Public Defender Reporter, Vol. 5 No. 6 (1982).

Defense counsel, by contrast, must often look to academics, medical professionals, engineers, and other specialists across the country—many of whom are not full-time experts. These experts maintain demanding practices and may not be willing or able to travel long distances to testify. Health conditions, professional obligations, or geography may limit their availability. Multiple studies confirm that permitting virtual testimony increases expert accessibility. See Jenia I. Turner, Remote Criminal Justice, 53 Tex. Tech L. Rev. 197 (2021); Ashley C.T. Jones, Ashley B. Batastini, Meera B. Patel, Donald F. Sacco, & Craig A. Warlick, Does Convenience Come with a Price? The Impact of Remote Testimony on Perceptions of Expert Credibility, Criminal Justice & Behavior, Vol. 50, Issue 2, at 197-215 (2022) (recognizing that experts are more accessible by remote testimony).

Experts are also very expensive, scarce in some fields, and in high

demand. Defense counsel must have the discretion to choose the best available expert for their case, even if that expert can only appear remotely. As stated by Professor Friedman of the University of Michigan Law School, an expert on evidence, the Confrontation Clause, and Supreme Court history:

If testimony of a witness for the accused in the courtroom would be admissible, which requires that it be more probative than prejudicial, then testimony of that witness by video transmission is likely still to be more probative than prejudicial, but less effective for the accused. A lenient attitude therefore appears presumptively optimal, and no constitutional requirement makes it inappropriate. Ordinarily, then, if the accused finds video transmission his most satisfactory alternative—given the importance of the witness's testimony and whatever costs and difficulties there may be in presenting the witness in the courtroom—the court should not second-guess that judgment.

[Friedman, 35 U. Mich. J.L. Reform at 714.]

While some studies suggest that remote testimony may be perceived as less credible, others indicate no measurable difference.³ Any potential impact on credibility is a strategic concern for the defense—not a source of prejudice to the State.

³ See, e.g., Turner, 53 Tex. Tech L. Rev. at 220-22; Alicia Bannon & Janna Adelstein, Brennan Center for Justice, The Impact of Video Proceedings on Fairness and Access to Justice in Court (Sept. 10, 2020), available at <https://www.brennancenter.org/our-work/research-reports/impact-video-proceedings-fairness-and-access-justice-court>.

Moreover, any potential concerns about remote testimony can be mitigated through “appropriate safeguards.” Courts in other jurisdictions have identified safeguards such as:

- (1) prohibiting anyone from being physically present with the witness, or requiring the identification of any such person;
- (2) prohibiting the witness from consulting notes or other documents, or requiring disclosure of any such documents;
- (3) prohibiting electronic or other communications with the witness during the testimony;
- (4) establishing procedures for showing documents or exhibits to the witness during direct and cross examination;
- (5) establishing procedures to ensure that the witness's testimony can be seen and/or heard;
- (6) establishing requirements to ensure that the witness's surroundings or backdrop does not cause unfair prejudice;
- and (7) requiring the witness and the parties to test arrangements before the witness testifies.

[D.C. Super. Ct. Civ. R. 43(b), 2022 cmt.]

See also Tenn. R. Civ. P. 43.01(b)(i) (adequate safeguards may include, among other things, the establishment of procedures for the “handling of exhibits,” “objections,” and “sidebar conferences,” as well as technological considerations, such as whether there should be requirements regarding camera angles, encryption protocols, and the like).

Ultimately, whether to present a witness remotely is a tactical decision. The defense, not the prosecution, must weigh the strategic risks. Unless the State can show substantial, articulable prejudice, remote expert testimony supported by good cause and adequate safeguards should be permitted.

CONCLUSION

Rule 1:2-1(b) was adopted to reflect the evolving realities of courtroom practice and to ensure fair, efficient, and equitable access to testimony through the use of remote technology. By applying the Pathri framework and its compelling circumstances standard, the lower courts imposed a burden that Rule 1:2-1(b) expressly rejected. The proper standard is good cause—a flexible, practical inquiry grounded in fairness, not formality.

April 21, 2025

Respectfully submitted,

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